

# Exhibit H

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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

Master Case No. C 09-03043 JF

In re FACEBOOK PPC Advertising Litigation

**PLAINTIFF STEVEN PRICE'S OBJECTIONS  
AND RESPONSES TO DEFENDANT  
FACEBOOK, INC.'S FIRST SET OF  
INTERROGATORIES**

Plaintiff Steven Price ("Plaintiff") hereby responds to Facebook, Inc.'s First Set of Interrogatories, served on Plaintiff's attorneys on September 16, 2010, subject to the accompanying objections, without waiving, and expressly preserving, all such objections. Plaintiff also responds subject to, without intending to waive, and expressly preserving: (a) any objections as to relevance, privilege, and admissibility of documents or information provided;

**PLAINTIFF STEVEN PRICE'S OBJECTIONS AND RESPONSES TO DEFENDANT'S  
FIRST SET OF INTERROGATORIES**

CV 09-03043

1 and (b) the right to object to other discovery procedures involving or relating to the subject  
2 matter of Defendant's requests.

3 Plaintiff responds and objects based on Plaintiff's attorneys' understanding of  
4 Defendant's language. Where it may be found that something was intended to be construed  
5 differently from their interpretation, Plaintiff reserves the right to amend Plaintiff's responses  
6 and objections.

7  
8 Plaintiff's factual investigation and legal analysis is ongoing and these responses and  
9 objections are without prejudice to later amendment and supplementation. Defendant has not yet  
10 fully produced documents and information (or otherwise given complete discovery). Plaintiff's  
11 discovery, investigation, and preparation for trial are ongoing and continuing as of the date of  
12 these responses. Plaintiff reserves the right to continue discovery and investigation of facts,  
13 witnesses, and supplemental information that may reveal information which, if presently within  
14 Plaintiff's knowledge, would have been included in these responses. Plaintiff reserves the right  
15 to present additional information as may be disclosed through continuing discovery and  
16 investigation. By this reservation, Plaintiff does not assume a continuing responsibility to update  
17 these responses (the present responses only cover information received until the date of service  
18 of these responses) beyond that required under the Federal Rules of Civil Procedure.

19  
20 **GENERAL OBJECTIONS**

21 All of the general Objections below are incorporated into each of the individual responses  
22 and have the same force and effect as if fully set forth therein. Plaintiff objects to Defendant's  
23 Interrogatories to the extent that:  
24

25 1. Defendant's definitions and instructions seek to impose obligations that exceed or  
26 differ from the requirements of the Federal Rules of Civil Procedure.  
27



1           2.     They seek to require responses or supplemental responses beyond the scope  
2 and/or requirements of the Federal Rules of Civil Procedure.

3           3.     They contravene the limits on the number of questions in any court orders, local  
4 rules, or the Federal Rules of Civil Procedure.

5           4.     They seek to establish or imply a waiver of Plaintiff's right to challenge the  
6 relevancy, materiality, or admissibility of the documents or information provided by Plaintiff, or  
7 to object to the use of documents or information in any subsequent proceeding or trial. In  
8 responding, Plaintiff does not waive the right to challenge the relevancy, materiality, and/or  
9 admissibility of the documents or information provided by Plaintiff, or to object to the use of the  
10 documents or information in any later proceeding or trial.

11           5.     They call for legal conclusions or premature expert discovery.

12           6.     They seek disclosure of documents, communications, information, and things  
13 protected by the attorney-client privilege or that constitutes attorney work-product/trial  
14 preparation materials or any other privileged documents or information, as well as documents or  
15 information that were compiled or prepared at the request and direction of counsel in anticipation  
16 of, or in conjunction with, litigation that are protected by the attorney work-product doctrine;  
17 items and information obtained by Plaintiff's attorneys that involve their professional skill and  
18 experience; legal research, including delegated research—which includes research or  
19 investigation by Plaintiff's attorneys, or by persons hired by Plaintiff's attorneys and acting  
20 under their supervision; strategic litigation planning, mental impressions (or documents  
21 reflecting such planning or impressions); and documents gathered by Plaintiff's attorneys while  
22 researching issues in this case. Further, it would also be unduly burdensome and oppressive to  
23  
24  
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27

1 search for, compile, and make a description of the nature of each such document,  
2 communication, etc.

3 7. They seek documents or information within the exclusive possession, custody or  
4 control of Defendant.

5 8. They seek documents or information contained in the pleadings and other papers  
6 filed in this action.

7 **SPECIFIC OBJECTIONS AND RESPONSES TO DEFENDANT'S**

8 **INTERROGATORIES**

9 **INTERROGATORY NO. 1:**

10 Identify all persons with knowledge regarding YOUR placement of advertisements on  
11 Facebook.com; YOUR tracking of clicks, impressions, and other data related to those  
12 advertisements; and YOUR claim that YOU were overcharged for clicks on those  
13 advertisements.

14 **RESPONSE TO INTERROGATORY NO. 1**

15 Plaintiff objects to this Interrogatory as vague, ambiguous, overbroad, unduly  
16 burdensome and not reasonably calculated to lead to the discovery of admissible evidence.  
17 Plaintiff further objects to this Interrogatory to the extent that it prematurely seeks expert  
18 discovery and/or information protected by the attorney-client privilege and/or the work product  
19 doctrine. *See Hickman v. Taylor*, 329 U.S. 495, 516 (1947) ("Discovery was hardly intended to  
20 enable a learned profession to perform its functions either without wits or on wits borrowed from  
21 the adversary."); *see also Upjohn Co. v. U.S.*, 449 U.S. 383, 385 (same).

22 Subject to and without waiving the above objections, Plaintiff identifies Steven Price as  
23 the person knowledgeable about his claims in this action.  
24

25 **INTERROGATORY NO. 2:**

1 Identify any prior litigation YOU were involved in, including the case name, case  
 2 number, the court in which the case was pending, and the name of YOUR legal counsel in the  
 case.

3 **RESPONSE TO INTERROGATORY NO. 2**

4 Plaintiff object to this Interrogatory as overbroad, unduly burdensome, and not  
 5 reasonably calculated to lead to the discovery of admissible evidence. Subject to and without  
 6 waiving the above objections, Plaintiff responds that he has been involved in the following prior  
 7 litigation matters:

- 8 (1) Personal injury claim arising out of an automobile accident in Los Angeles  
 9 County. Plaintiff does not recall the case name, the case number, the court in  
 10 which the case was filed or the name of his legal counsel (if any).
- 11 (2) Right to work dispute Auto Dealer Marketing in Los Angeles County. Plaintiff  
 12 does not recall the case name, the case number, the court in which the case  
 13 was filed or the name of his legal counsel (if any).
- 14 (3) Divorce from Tanya Neilson in Los Angeles County. Plaintiff does not recall  
 15 the case name, the case number, the court in which the case was filed or the  
 16 name of his legal counsel (if any).
- 17 (4) Dissolution of marriage to Elizabeth Bont in Placer County. Plaintiff does not  
 18 recall the case name, the case number, the court in which the case was filed or  
 19 the name of his legal counsel (if any).
- 20 (5) Annulment of marriage to Natasha McCann in Los Angeles County. Plaintiff  
 21 does not recall the case name, the case number, or the court in which the case  
 22 was filed. Plaintiff was not represented by counsel.  
 23  
 24  
 25  
 26  
 27



(6) Child custody proceedings involving REDACTED in Los Angeles County. Plaintiff does not recall the case name or the court in which the case was filed. Plaintiff has been formerly represented by Brain Moore, and is currently acting as his own counsel.

(7) Trademark infringement case styled *The American Automobile Association, Inc. v. E-Responses.Com and Steven Price*, Case No. CV 10 2609 EMC, United States District Court for the Northern District of California. Plaintiff was represented by Arias Ozzello & Gignac LLP.

**INTERROGATORY NO. 3:**

Describe any prior experience or relationship YOU had with YOUR current legal counsel in this matter, including whether any counsel have represented YOU previously and, if so, the case name, case number, and court in which the case was pending.

**RESPONSE TO INTERROGATORY NO. 3**

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above objections, Plaintiff responds that he was represented by Arias Ozzello & Gignac LLP in the trademark infringement case identified in response to Interrogatory No. 2.

**INTERROGATORY NO. 4:**

Identify all entities or websites with which you have placed online advertisements on a pay-per-click basis other than Facebook.com.

**RESPONSE TO INTERROGATORY NO. 4**

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above objections, Plaintiff responds as follows: none.

**INTERROGATORY NO. 6:**

1 For each of the web-pages and statements on Facebook.com identified in the AMENDED  
 2 COMPLAINT (including those described in paragraphs 33-35, 37, 39, and 51, and exhibits A-E),  
 state whether YOU reviewed that web-page and/or statement.

3 **RESPONSE TO INTERROGATORY NO. 6**

4 Plaintiff objects to this Interrogatory on the grounds that it is vague and ambiguous as to  
 5 the phrase "web-pages and statements on Facebook.com identified in the AMENDED  
 6 COMPLAINT" because it fails to specify exactly each of the "web-pages and statements" it is  
 7 referring to. Plaintiff objects on the grounds that the Interrogatory is compound and exceeds the  
 8 limits set forth by the Federal Rules of Civil Procedure. Subject to and without waiving the  
 9 above objections, Plaintiff responds that he reviewed Exhibits A-E to the Amended Complaint.  
 10

11 **INTERROGATORY NO. 7:**

12 For each of the web-pages and statements on Facebook.com YOU claim to have  
 13 reviewed in response to Interrogatory No. 6, state when YOU reviewed the web-page and/or  
 statement.

14 **RESPONSE TO INTERROGATORY NO. 7**

15  
 16 Plaintiff objects to this Interrogatory on the grounds that Interrogatory No. 6 is vague and  
 17 ambiguous as to the phrase "web-pages and statements on Facebook.com identified in the  
 18 AMENDED COMPLAINT" because it fails to specify exactly each of the "web-pages and  
 19 statements" it is referring to. Plaintiff objects on the grounds that the Interrogatory is compound  
 20 and exceeds the limits set forth by the Federal Rules of Civil Procedure. Plaintiff also objects to  
 21 this Interrogatory to the extent it seeks information already contained in Plaintiffs' Second  
 22 Amended Complaint. Subject to and without waiving the above objections, Plaintiff states that  
 23 before placing pay-per-click advertising on Facebook, Plaintiff recalls seeing statements  
 24 promising that Facebook had a range of filters and other measures in place to guard against  
 25 invalid clicks and that Facebook would not charge for invalid clicks, such as those reflected in  
 26  
 27



1 Exhibits A-E attached to the Second Amended Complaint.

2 **INTERROGATORY NO. 8:**

3 For each of the web-pages and statements on Facebook.com YOU claim to have  
4 reviewed in response to the Interrogatory No. 6, describe whether and how YOU allegedly relied  
5 on the web pages and/or statements to your detriment.

6 **RESPONSE TO INTERROGATORY NO. 8**

7 Plaintiff objects to this Interrogatory on the grounds that Interrogatory No. 6 is vague and  
8 ambiguous as to the phrase "web-pages and statements on Facebook.com identified in the  
9 AMENDED COMPLAINT" because it fails to specify exactly each of the "web-pages and  
10 statements" it is referring to. Plaintiff objects on the grounds that the Interrogatory is compound  
11 and exceeds the limits set forth by the Federal Rules of Civil Procedure. Plaintiff also objects to  
12 this Interrogatory as overbroad, unduly burdensome, and to the extent it seeks information  
13 already contained in Plaintiffs' Second Amended Complaint. Subject to and without waiving the  
14 above objections, Plaintiff responds that he relied on the statements set forth above in response to  
15 Interrogatory No. 7 and that these statements were a substantial factor in influencing his decision  
16 to purchase pay-per-click advertising from Facebook. Plaintiff monitored the click activity  
17 received on his Facebook advertisements. Plaintiff stopped placing pay-per-click advertisements  
18 with Facebook due to charges for invalid clicks.

19  
20 **INTERROGATORY NO. 9**

21 Identify all software, applications, or services YOU used for the purpose of tracking the  
22 number of clicks received on YOUR advertisements on Facebook.com and/or the number of  
23 impressions of those advertisements that were served.

24 **RESPONSE TO INTERROGATORY NO. 9**

1 Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not  
 2 reasonably calculated to lead to the discovery of admissible evidence. Plaintiff also objects on  
 3 the grounds that the terms "software, applications or services" is vague and ambiguous. Subject  
 4 to and without waiving these objections, Plaintiff responds that he has used Facebook, Google  
 5 Analytics, and StatCounter.com.

6 **INTERROGATORY NO. 10**

7 Describe the nature and amount of all damages YOU allege YOU suffered as a result of  
 8 advertising on Facebook.com.

9 **RESPONSE TO INTERROGATORY NO. 10**

10 Plaintiff objects to this Interrogatory as overbroad and unduly burdensome. Plaintiffs  
 11 further object to this Interrogatory to the extent it seeks information within the Defendant's  
 12 knowledge and to the extent that it prematurely seeks expert discovery.

13 Subject to and without waiving the above objections, Plaintiff responds that his damages  
 14 include all amounts that Facebook charged him for invalid clicks (including fraudulent clicks)  
 15 and interest on such amounts.

16 **INTERROGATORY NO. 11**

17 For each advertisement YOU placed on Facebook.com, identify each click YOU allege  
 18 was improperly charged to YOU (including the date, time, and associated IP address for each  
 19 such click).

20 **RESPONSE TO INTERROGATORY NO. 11**

21 Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not  
 22 reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to  
 23 this Interrogatory in that it is premature and much of this information is in Defendant's  
 24 possession, custody or control and that Defendant has not produced such information despite  
 25 Plaintiff's discovery requests.  
 26  
 27



**INTERROGATORY NO. 12**

For each click identified in Interrogatory No. 11, state all reasons why YOU contend the click was fraudulent, improper, invalid, or otherwise should not have been charged to YOUR account.

**RESPONSE TO INTERROGATORY NO. 12**

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Interrogatory in that much of this information is in Defendant's possession, custody or control and is being requested from Defendant in discovery.

Plaintiff also objects to this Interrogatory as a premature contention interrogatory. Courts have routinely found that requiring responses to contention discovery at an early stage of the discovery process is neither necessary nor wise. As Judge Brazil observed in *In re Convergent Technologies Sec. Litig.*, 108 F.R.D. 328, 332 (N.D. Cal. 1985), "[T]here is substantial reason to believe that the early knee jerk filing of sets of contention interrogatories that systematically track all the allegations in an opposing party's pleadings is a serious form of discovery abuse. Such comprehensive sets of contention interrogatories can be almost mindlessly generated, can be used to impose great burdens on opponents, and can generate a great deal of counterproductive friction between parties and counsel. Moreover, at least in cases where defendants presumably have access to most of the evidence about their own behavior, it is not at all clear that forcing plaintiffs to answer these kinds of questions, early in the pretrial period, is sufficiently likely to be productive to justify the burden that responding can entail." 108 F.R.D. at 337-338. *Accord, Nestlé Foods Corp. v. Aetna Cas. and Sur. Co.*, 135 F.R.D. 101, 110-111 (D.N.J. 1990) ("This Court agrees that judicial economy as well as efficiency for the litigants dictate that contention interrogatories are more appropriate after a substantial amount of



discovery has been conducted.”); *Leksi, Inc. v. Federal Ins. Co.*, 129 F.R.D. 99, 107 (D.N.J. 1989) (same).

### **INTERROGATORY NO. 13**

If you contend that Facebook failed to implement certain measures to detect and screen clicks that are potentially fraudulent, improper, or invalid, describe all such measures.

### **RESPONSE TO INTERROGATORY NO. 13**

Plaintiff objects to this Interrogatory as overbroad and unduly burdensome. Plaintiff further objects to this Interrogatory to the extent it prematurely seeks expert discovery. Plaintiff also objects to this Interrogatory as a premature contention interrogatory. Courts have routinely found that requiring responses to contention discovery at an early stage of the discovery process is neither necessary nor wise. As Judge Brazil observed in *In re Convergent Technologies Sec. Litig.*, 108 F.R.D. 328, 332 (N.D. Cal. 1985), “[T]here is substantial reason to believe that the early knee jerk filing of sets of contention interrogatories that systematically track all the allegations in an opposing party’s pleadings is a serious form of discovery abuse. Such comprehensive sets of contention interrogatories can be almost mindlessly generated, can be used to impose great burdens on opponents, and can generate a great deal of counterproductive friction between parties and counsel. Moreover, at least in cases where defendants presumably have access to most of the evidence about their own behavior, it is not at all clear that forcing plaintiffs to answer these kinds of questions, early in the pretrial period, is sufficiently likely to be productive to justify the burden that responding can entail.” 108 F.R.D. at 337–338. *Accord*, *Nestlé Foods Corp. v. Aetna Cas. and Sur. Co.*, 135 F.R.D. 101, 110–111 (D.N.J. 1990) (“This Court agrees that judicial economy as well as efficiency for the litigants dictate that contention interrogatories are more appropriate after a substantial amount of discovery has been conducted.”); *Leksi, Inc. v. Federal Ins. Co.*, 129 F.R.D. 99, 107 (D.N.J. 1989) (same).

### **INTERROGATORY NO. 14**

Describe how YOU determined, at the time YOU filed the ORIGINAL COMPLAINT, that Facebook allegedly overcharged YOU for clicks on YOUR advertisements on

Facebook.com, including what specific data or other information YOU relied on in making that determination.

#### **RESPONSE TO INTERROGATORY NO. 14**

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above objections, Plaintiff directs Defendant to the allegations contained in Plaintiffs' Second Amended Complaint, in particular, Paragraphs 70 through 74.

#### **INTERROGATORY NO. 15**

What do YOU contend is the definition of the term "improper" as that term is used in the DISCLAIMER relating to certain categories of clicks.

#### **RESPONSE TO INTERROGATORY NO. 15**

Plaintiff objects to this Interrogatory as vague and ambiguous and on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the above objections, Plaintiff disputes the validity of the DISCLAIMER in his contract and whether such disclaimer was adequately disclosed to him. Further responding, Plaintiff asserts that the DISCLAIMER is ambiguous and inconsistent with the statements and representations of Facebook as set forth in Exhibits A-E of Plaintiffs' Second Amended Complaint.

#### **INTERROGATORY NO. 16**

State all facts that support or relate to your response to Interrogatory No. 15.

#### **RESPONSE TO INTERROGATORY NO. 16**

Plaintiff objects to this Interrogatory as a premature contention interrogatory. Courts have routinely found that requiring responses to contention discovery at an early stage of the discovery process is neither necessary nor wise. As Judge Brazil observed in *In re Convergent*



1 *Technologies Sec. Litig.*, 108 F.R.D. 328, 332 (N.D. Cal. 1985), “[T]here is substantial reason to  
 2 believe that the early knee jerk filing of sets of contention interrogatories that systematically  
 3 track all the allegations in an opposing party’s pleadings is a serious form of discovery abuse.  
 4 Such comprehensive sets of contention interrogatories can be almost mindlessly generated, can  
 5 be used to impose great burdens on opponents, and can generate a great deal of  
 6 counterproductive friction between parties and counsel. Moreover, at least in cases where  
 7 defendants presumably have access to most of the evidence about their own behavior, it is not at  
 8 all clear that forcing plaintiffs to answer these kinds of questions, early in the pretrial period, is  
 9 sufficiently likely to be productive to justify the burden that responding can entail.” 108 F.R.D.  
 10 at 337–338. *Accord, Nestlé Foods Corp. v. Aetna Cas. and Sur. Co.*, 135 F.R.D. 101, 110–111  
 11 (D.N.J. 1990) (“This Court agrees that judicial economy as well as efficiency for the litigants  
 12 dictate that contention interrogatories are more appropriate after a substantial amount of  
 13 discovery has been conducted.”); *Leksi, Inc. v. Federal Ins. Co.*, 129 F.R.D. 99, 107 (D.N.J.  
 14 1989) (same).

#### 17 **INTERROGATORY NO. 17**

18 What do YOU contend is the definition of the term “invalid” as YOU use that term in the  
 19 AMENDED COMPLAINT to describe certain types of clicks.

#### 20 **RESPONSE TO INTERROGATORY NO. 17**

21 Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and to the extent  
 22 it seeks information already contained in Plaintiffs’ Second Amended Complaint. Subject to and  
 23 without waiving the above objections, Plaintiff directs Defendant to the allegations contained in  
 24 Plaintiffs’ Second Amended Complaint, in particular, Paragraph 3.  
 25  
 26  
 27



**INTERROGATORY NO. 18**

State all facts that support or related to your response to Interrogatory No. 17.

**RESPONSE TO INTERROGATORY NO. 18**

Plaintiff objects to this Interrogatory as a premature contention interrogatory. Courts have routinely found that requiring responses to contention discovery at an early stage of the discovery process is neither necessary nor wise. As Judge Brazil observed in *In re Convergent Technologies Sec. Litig.*, 108 F.R.D. 328, 332 (N.D. Cal. 1985), “[T]here is substantial reason to believe that the early knee jerk filing of sets of contention interrogatories that systematically track all the allegations in an opposing party’s pleadings is a serious form of discovery abuse. Such comprehensive sets of contention interrogatories can be almost mindlessly generated, can be used to impose great burdens on opponents, and can generate a great deal of counterproductive friction between parties and counsel. Moreover, at least in cases where defendants presumably have access to most of the evidence about their own behavior, it is not at all clear that forcing plaintiffs to answer these kinds of questions, early in the pretrial period, is sufficiently likely to be productive to justify the burden that responding can entail.” 108 F.R.D. at 337–338. *Accord*, *Nestlé Foods Corp. v. Aetna Cas. and Sur. Co.*, 135 F.R.D. 101, 110–111 (D.N.J. 1990) (“This Court agrees that judicial economy as well as efficiency for the litigants dictate that contention interrogatories are more appropriate after a substantial amount of discovery has been conducted.”); *Leksi, Inc. v. Federal Ins. Co.*, 129 F.R.D. 99, 107 (D.N.J. 1989) (same).

**INTERROGATORY NO. 19**

What do YOU contend is the definition of the term “fraudulent” as YOU use that term in the AMENDED COMPLAINT to describe certain types of clicks.

**RESPONSE TO INTERROGATORY NO. 19**

Plaintiff objects to this Interrogatory as overbroad, unduly burdensome, and to the extent it seeks information already contained in Plaintiffs’ Amended Complaint. Subject to and without waiving the above objections, Plaintiff directs Defendant to the allegations contained in Plaintiffs’ Second Amended Complaint, in particular, Paragraph 3.

**INTERROGATORY NO. 20**

State all facts that support or relate to your response to Interrogatory No. 19.

**RESPONSE TO INTERROGATORY NO. 20**

Plaintiff objects to this Interrogatory as a premature contention interrogatory. Courts have routinely found that requiring responses to contention discovery at an early stage of the discovery process is neither necessary nor wise. As Judge Brazil observed in *In re Convergent Technologies Sec. Litig.*, 108 F.R.D. 328, 332 (N.D. Cal. 1985), “[T]here is substantial reason to believe that the early knee jerk filing of sets of contention interrogatories that systematically track all the allegations in an opposing party’s pleadings is a serious form of discovery abuse. Such comprehensive sets of contention interrogatories can be almost mindlessly generated, can be used to impose great burdens on opponents, and can generate a great deal of counterproductive friction between parties and counsel. Moreover, at least in cases where defendants presumably have access to most of the evidence about their own behavior, it is not at all clear that forcing plaintiffs to answer these kinds of questions, early in the pretrial period, is sufficiently likely to be productive to justify the burden that responding can entail.” 108 F.R.D. at 337–338. *Accord, Nestlé Foods Corp. v. Aetna Cas. and Sur. Co.*, 135 F.R.D. 101, 110–111

(D.N.J. 1990) ("This Court agrees that judicial economy as well as efficiency for the litigants dictate that contention interrogatories are more appropriate after a substantial amount of discovery has been conducted."); *Leksi, Inc. v. Federal Ins. Co.*, 129 F.R.D. 99, 107 (D.N.J. 1989) (same).

Dated: November 15, 2010

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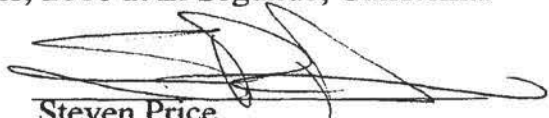
*Additional Counsel for Plaintiffs*

**VERIFICATION**

I am one of the named plaintiffs in the action entitled *In re Facebook PPF Advertising Litigation*, Master Case No. C 09-03043 JF. I am familiar with the contents of the foregoing document entitled: **PLAINTIFF STEVEN PRICE'S OBJECTIONS AND RESPONSES TO DEFENDANT FACEBOOK, INC.'S FIRST SET OF INTERROGATORIES**. The information supplied therein is based on my own personal knowledge and/or has been supplied by my attorneys or other agents and/or compiled from available documents, and is therefore provided as required by law. The information contained in the foregoing document provided by me is true and as to those matters that were provided by my attorneys and/or agents, including all contentions and opinions, I am informed and believe that they are true.

I declare under penalty of perjury of the laws of the State of California the foregoing is true and correct.

Executed on the 12 day of November, 2010 at El Segundo, California.

  
Steven Price